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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RENE R. OBLITAS,
Plaintiff,
v.
NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
Defendant.

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Case No. 2:17-cv-02420-JAD-VCF
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**STIPULATION AND ~~PROPOSED~~ ORDER
FOR EXTENSION OF TIME FOR
DEFENDANT TO FILE OPPOSITION TO
PLAINTIFF'S MOTION TO REMAND**
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IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have an extension of time of 7 days to file her opposition to Plaintiff's motion to remand, to be continued from February 20, 2018, to February 27, 2018.

This is the first continuance in this case sought by Defendant. There is good cause for this request. Defendant is seeking this extension due to Defendant's counsel's crowded briefing schedule with multiple deadlines on or around February 20, 2018, including briefing for an Equal Employment Opportunity Commission (EEOC) case with a voluminous record, that has been previously extended multiple times. Because of the factors described above, Defendant is requesting additional time up to

1 and including February 27, 2018, to fully review the administrative record and research the issues
2 presented by Plaintiff's motion to remand. This request is made in good faith with no intention to
3 unduly delay the proceedings.

4 Therefore, with this Court's approval, the Court's scheduling order shall be extended by 7 days,
5 so that Defendant may file her opposition to Plaintiff's motion to remand on or before February 27,
6 2018.

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8 Respectfully submitted,

9 Dated: February 16, 2018

LAW OFFICES OF LAWRENCE D. ROHLFING

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11 */s/ Cyrus Safa*
12 (as authorized via e-mail on 2/16/2018)
CYRUS SAFA
Attorneys for Plaintiff

13 Dated: February 16, 2018

STEVEN W. MYHRE
Acting United States Attorney

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15 */s/ Carolyn B. Chen*
16 CAROLYN B. CHEN
Special Assistant United States Attorney

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20 ORDER

21 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.
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23 DATED: 2-16-2018

24 HON. CAM FERENBACH
25 UNITED STATE MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, Carolyn B. Chen, certify that the following individuals were served with a copy of the
**STIPULATION AND PROPOSED ORDER FOR EXTENSION OF TIME FOR DEFENDANT
TO FILE OPPOSITION TO PLAINTIFF'S MOTION TO REMAND** on the date and via the
method of service identified below:

CM/ECF:

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Dated this 16th day of February 2018.

/s/ Carolyn B. Chen
CAROLYN B. CHEN
Special Assistant United States Attorney